

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Gary M. and Garyonna M., minors, by and through their next friends, April Zealous and Gary McDaniel, and April Zealous and Gary McDaniel,

Plaintiffs,

v.

City of North Charleston, Officer Bradley Woods, Captain Scott Perry, Sergeant Charity Prosser, Deputy Chief Coyle Kinard, Detective Karen MacDonald, Lieutenant Wade Humphries, Lieutenant Bowman, Sergeant Rob Kruger, Sergeant Skip Allen, MPO Winston Williams, PFC Clarence Habersham, PFC Christopher Gorman, PFC Charles Champion, PCC Justin Fogle, PFC Jeremy Stevens, and PFC Joshua Quick,

Defendants.

C/A No.: 2:16-CV-1087-DCN-MGB

**NOTICE OF REMOVAL**

YOU WILL PLEASE TAKE NOTICE that this entitled cause has this date been removed to the United States District Court for the District of South Carolina by filing in that Court this Notice and filing in the Court of Common Pleas for Charleston County a copy of this Notice.

This is a civil suit, commenced on January 21, 2015, by the filing of a Summons and Complaint in the Court of Common Pleas for Charleston County. On March 22, 2016, an Amended Complaint was filed with the Court of Common Pleas for Charleston County. The Complaint, a copy of which is attached hereto, was served on counsel for defendants who acknowledged service on all defendants on March 24, 2016 and April 4, 2016. Robin L. Jackson, Esquire, will represent and appear for the Defendants.

The United States District Court has original jurisdiction over this action pursuant to the provisions of 28 U.S.C. §§ 1331 and 1343, in that the Amended Complaint alleges causes of action arising under 42 U.S.C. § 1983 and the deprivation of constitutional rights secured by the Constitution and laws of the United States of America.

This suit is one which may be removed to the United States District Court by the Defendants, pursuant to the provisions of 28 U.S.C. § 1441(a) and (c), as one or more of the claims arise under the Constitution and laws of the United States of America.

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